



LINDA WONG
Member of NJ, PA, NY, VA & DC Bars

lwong@wongfleming.com

January 24, 2023

VIA ECF

The Honorable Zahid N. Quraishi, U.S.D.J.
U.S. District Court, District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: John Doe v. Princeton University, et al.,
Civil Case No. 3:22-cv-05887-ZNQ-DEA
Request for Extension of Time

Dear Judge Quraishi:

This firm, with co-counsel from Crowell & Moring, represents Defendant The Trustees of Princeton University ("Princeton"). On December 19, 2022, Princeton filed a Motion to Dismiss under F.R.C.P. 12(b)(6) (ECF No. 24). We respectfully request a 15-day extension of time to file Princeton's Reply to Plaintiff's Opposition (ECF No. 26) to the Motion to Dismiss, which would reset the reply deadline to February 14 and move the motion hearing date one cycle to February 21.

Princeton submits there are good reasons to grant this extension. First, counsel require sufficient time to review Plaintiff's 30-page Opposition, draft a thoughtful reply, and have that brief reviewed and approved by their client. Lead outside counsel Ms. Malson is in interviews for another matter all of this week and much of the next, and her co-counsel Ms. Berman will be travelling February 3-6. Extending the Reply deadline by 15 days is also fair in light of the fact that Plaintiff obtained a 20-day extension of the Opposition brief deadline. This shorter extension of the Reply deadline and motions date will not unduly delay resolution of the Motion to Dismiss, and will serve judicial efficiency by allowing for thorough briefing of the pending Motion, which may resolve some or all of Plaintiff's four sets of claims.

This is Princeton's first request for an extension. Princeton's counsel requested consent from Plaintiff's counsel, who represented that Plaintiff opposes an extension.

821 ALEXANDER ROAD, SUITE 200 • P.O. BOX 3663 • PRINCETON, NJ 08543-3663
TEL: (609) 951-9520 • FAX: (609) 951-0270
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Thank you for Your Honor's consideration in this regard.

Respectfully submitted,

/s/Linda Wong

Wong Fleming

Laurel Pyke Malson (*pro hac vice*)

Amanda Shafer Berman (*pro hac vice*)

Crowell & Moring LLP

Counsel for Defendant Princeton

LW/ss

cc: All Counsel of Record (via ECF)